



Attorneys At Law

Trust. Knowledge. Confidence.

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May 20, 2022

**VIA CM/ECF**

Honorable David J. Novak  
U. S. District Court, Eastern District of Virginia  
Walter E. Hoffman  
United States Courthouse  
600 Granby Street  
Norfolk, VA 23510

**Re: Campbell, et al. v. Intercontinental Capital Group, Inc.,  
No. 3:22-cv-00034-DJN**

Dear Judge Novak:

I represent the Defendant Intercontinental Capital Group, Inc. ("Defendant") in the above referenced action and write jointly with Plaintiffs regarding the status of this matter and to request an extension of the stay in this matter until June 3, 2022.

Since the Parties' mediation on April 19, 2022, the Parties have been communicating regarding financial documents Plaintiffs requested. As stated in the Parties previous letter, Defendant has provided ICG's audited financial statements for 2019, 2020 and 2021 and preliminary financial information related to Q1 2022. In addition, Defendant has provided written responses to Plaintiff's follow up questions regarding the financial information. Plaintiffs have the option to not move forward with the settlement upon reviewing the financial information. On Wednesday, May 18, 2022, Plaintiffs' counsel advised Defendant's counsel that there were concerns about the terms of the settlement as outlined at the settlement conference and were not moving forward with the settlement. Accordingly, the Parties are exchanging proposals to modify the terms and structure of settlement payments to satisfy Plaintiffs' concerns.

The Parties continue to be optimistic that they will be able to reach a final settlement and kindly request that this matter be stayed until June 3, 2022, at which time the Parties will report whether they have finalized settlement and will be seeking preliminary approval.

Respectfully,

A handwritten signature in black ink, appearing to read "KTB", with a long horizontal flourish extending to the right.

Katharine Thomas Batista  
4856-9411-6641, v. 1